

1 SCOTT A. SUGARMAN (No. 68277)  
2 SUGARMAN & CANNON  
3 737 Tehama Street, No. 3  
4 San Francisco, CA. 94103  
5 Telephone: (415) 362-6252  
6 Facsimile: (415) 362-6431  
[scott@sugarmandalcannon.com](mailto:scott@sugarmandalcannon.com)

7  
8 Attorneys for Defendant  
9 TERRY JACKSEN  
10

11  
12  
13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
15

16  
17 UNITED STATES OF AMERICA, ) No. CR 13-0006 WHA  
18 Plaintiff, )  
19 v. ) STIPULATION AND ~~proposed~~  
20 ) ORDER TO CONTINUE  
21 TERRY JACKSEN, ) HEARING  
22 Defendant. )  
23

24 The parties appeared before this Court on September 5, 2017 with regard to an Amended  
25 Supervised Release Petition regarding Mr. Jacksen's alleged continued use of methamphetamine.  
26 United States Probation Officer Cris Taylor reported to the Court, as he had previously reported  
27 to both counsel, that Mr. Jacksen was otherwise performing well on supervised release, including  
28 being employed full-time and reporting faithfully to Mr. Taylor. The Court expressed concern  
about Mr. Jacksen's alleged continued use of methamphetamine. Mr. Taylor told the Court that  
the parties had discussed and tentatively agreed on a proposed resolution, but Mr. Sugarman was  
not present in Court to conclude those discussions. This Court continued this matter to October  
10, 2017 for further review of the Petition.

1 Prior to that hearing, counsel for Mr. Jacksen and Mr. Taylor discussed the possibility of  
2 Mr. Jacksen entering residential drug treatment. However, Mr. Taylor explained that at that time  
3 he believed for several reasons it was not feasible to place Mr. Jacksen in residential drug  
4 treatment. Still, Mr. Taylor learned about 10 days ago that he could place Mr. Jacksen in  
5 residential treatment for 31 days, and on September 27, 2017, Mr. Taylor enrolled in a residential  
6 treatment program. As Mr. Taylor wrote to both counsel:  
7

8 Terry Jacksen has a pending revocation matter schedule before the court on  
9 October 10, 2017. The nature of the violations of supervised release are all  
10 substance abuse related. On September 27, 2017, Terry Jacksen entered Turning  
Point residential substance-abuse treatment program in Santa Rosa. He was able  
11 to be placed on a 31-day residential bed space.

12 United States Probation has been able to confirm with [Mr. Jacksen's] employer  
13 that they will hold his position until his release on or about November 1, 2017.  
14 Based on the nature of the violations pending before the court, United States  
15 Probation, Scott Sugarman (defense counsel), and Claudia A. Quiroz (Assistant  
16 United States Attorney) jointly believe that residential substance-abuse treatment  
17 is in Mr. Jacksen's best interest.

18 As a result, it is respectfully requested that the court move the pending revocation  
19 matter to November 21, 2017.

20 The parties request this continuance because Mr. Taylor informed counsel for both parties  
21 that Turning Point does not permit the participants in their residential drug treatment program to  
22 leave during the program. Because Mr. Jacksen will not have concluded the program by the  
23 October 10, 2017 hearing, the parties respectfully request a continuance so that his treatment is  
24 not disrupted.

25 The parties concur in Mr. Taylor's comments above, and believe it would be useful to  
26 allow Mr. Jacksen to complete the 31-day residential program he entered a week ago. Counsel  
27 are not able to appear until November 21, 2017. Accordingly, the parties STIPULATE to  
28

1 continue the scheduled hearing from October 10, 2017 at 2:00 p.m. to November 21, 2017 at  
2  
2:00 p.m.

3 Undersigned defense counsel spoke with United States Probation Officer Taylor and he  
4 agrees with this requested continuance.

5 IT IS SO STIPULATED.

6 DATED: October 5, 2017

7 

---

  
/s/  
8 Claudia A. Quiroz  
9 Assistant United States Attorney

10 DATED: October 5, 2017

11 

---

  
/s/  
12 Scott A. Sugarman  
13 Attorney for Terry Jacksen

14 SO ORDERED.

15 DATE: October 5, 2017.

16   
17 WILLIAM H. ALSUP  
18 UNITED STATES DISTRICT JUDGE

19  
20  
21  
22  
23  
24  
25  
26  
27  
28